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IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.) Case 2:13-cv-0999-RJS-PMW
)
)
SERGIO FERNANDO SOSA and)
SERGIO CENTRO LATINO)
)
Defendants)

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.) Case 2:16-cv-0352-RJS-PMW
)
)
DAVID H. SOSA; CINTHIA T. C.)
GALEANO; ALMA ROSE GODINEZ;)
and SERGIO CENTRO LATINO,)
)
Defendants)

UNITED STATES' UNOPPOSED MOTION TO STAY CASE

The United States of America hereby moves for a stay of the entire case in the above-captioned case.

1. At the end of the day on December 21, 2018, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. The same is true for several other Executive agencies, including the Internal Revenue Service. The Department does not know when funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys and employees of the IRS are prohibited from working, even on a voluntary basis, except in limited circumstances, including "emergencies involving the safety of human life or the protection of property." 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice therefore requests a stay of this case until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. The Government requests that, at that point, all current deadlines for the parties be extended to commensurate with the duration of the lapse in appropriations.

5. Counsel for Defendants has advised undersigned counsel that she does not oppose this motion.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Government hereby moves for a stay of the entire case until

Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Respectfully submitted this 10th day of January, 2019.

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

/s/Rick Watson
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CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing was completed on January 10, 2019, by filing that document through the Court's electronic filing system, which effected service on the following:

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